



MEMORANDUM

TO: Angela D. Marconi, P.E., BCEE 

FROM: Bradley A. Klotz 

SUBJECT: **Title V Permit Renewal; Draft/Proposed Permit: AQM-003/00111-Renewal 3**
Delaware Solid Waste Authority (DSWA)-Cherry Island Landfill

DATE: June 8, 2017

This memorandum (report) summarizes the justification of the attached (Draft/Proposed) Title V operating permit. Note that Attachment A on page 45 of the attached permit includes the Revision History of Title V permit.

BACKGROUND

DSWA owns and operates Cherry Island Landfill (CIL). CIL is located in Wilmington, Delaware. The facility's latest Title V renewal application, related information, and the draft/proposed permit are being advertised for forty-five days, with concurrent draft and proposed review periods.

Under their previous Title V Operating Permit, at the Cherry Island Landfill, the Delaware Solid Waste Authority (DSWA) was permitted to operate two (2) 4500 SCFM low NO_x flares designated ZULE A & ZULE B and a 2100 SCFM LFG Specialties Flare. Due to unanticipated operational problems associated with the ZULE A and ZULE B flares which resulted in a series of flashbacks that occurred on two (2) previous occasions in the past four (4) years, causing internal and external damage to the flares, DSWA initially requested a temporary permit to construct and operate a 2100 SCFM LFG Specialties flare to control emissions from the landfill. Subsequent to this flare, DSWA received a limited term air permit for the 3000 SCFM flare, with the final intention to secure an operational permit for the 4500 SCFM flare. DSWA has demolished both ZULE Flares and installed a 4500 SCFM (PEI) enclosed ground flare. Before ZULE-B could be demolished DSWA had to first secure capacity to safely and reliably combust up to 3000 SCFM of landfill gas. Once the 3000 SCFM flare was installed and commissioned, the 2100 SCFM flare was decommissioned and removed from the site. This flare was subsequently removed and the 4500 SCFM flare was installed. The facility is located at 1706 East 12th Street, Wilmington, Delaware.

The only major changes other than the administrative duties associated with renewing the existing Title V Operating Permit, is to incorporate the requirements of the 4500 SCFM Perennial Flare Federally Enforceable **Permit: APC-2015/0091-Operation (NSPS)(FE)** issued to DSWA on May 9, 2016.

RECOMMENDATIONS

- Send the Draft/Proposed permit to DSWA and EPA Region III.

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pc: Dover File
EPA Region III